

MEMO ENDORSED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RAFAELA ESPINAL, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

DIDI GLOBAL INC. F/K/A XIAOJU KUAIZHI INC.,
WILL WEI CHENG, ALAN YUE ZHUO, JEAN QING
LIU, STEPHEN JINGSHI ZHU, ZHIYI CHEN, MARTIN
CHI PING LAU, KENTARO MATSUI, ADRIA PERICA,
DANIEL YONG ZHANG, GOLDMAN SACHS (ASIA)
L.L.C., MORGAN STANLEY & CO. LLC, J.P.
MORGAN SECURITIES LLC, BOFA SECURITIES,
INC., BARCLAYS CAPITAL INC., CHINA
RENAISSANCE SECURITIES (HONG KONG)
LIMITED, CHINA INTERNATIONAL CAPITAL
CORPORATION HONG KONG SECURITIES
LIMITED, CITIGROUP GLOBAL MARKETS INC.,
GUOTAI JUNAN SECURITIES (HONG KONG)
LIMITED, HSBC SECURITIES (USA) INC., UBS
SECURITIES LLC, BOCCI ASIA LIMITED, BOCOM
INTERNATIONAL SECURITIES LIMITED, CCB
INTERNATIONAL CAPITAL LIMITED, CLSA
LIMITED, CMB INTERNATIONAL CAPITAL
LIMITED, FUTU INC., ICBC INTERNATIONAL
SECURITIES LIMITED, MIZUHO SECURITIES USA
LLC, and TIGER BROKERS (NZ) LIMITED,

Defendants.

JATIN CHOPRA, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

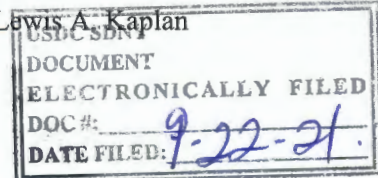
v.

DIDI GLOBAL INC. F/K/A XIAOJU KUAIZHI INC.,
WILL WEI CHENG, ALAN YUE ZHUO, JEAN QING
LIU, STEPHEN JINGSHI ZHU, ZHIYI CHEN, MARTIN
CHI PING LAU, KENTARO MATSUI, ADRIA PERICA,
DANIEL YONG ZHANG, GOLDMAN SACHS (ASIA)
L.L.C., MORGAN STANLEY & CO. LLC, J.P.
MORGAN SECURITIES LLC, BOFA SECURITIES,
INC., BARCLAYS CAPITAL INC., CHINA
RENAISSANCE SECURITIES (HONG KONG)

Case No. 1:21-cv-05807-LAK

CLASS ACTION

Honorable Lewis A. Kaplan



The Clerk
shall serve
DI 29 and DI ~~40~~
12. per

Case No. 1:21-cv-05973

SO ORDERED

LEWIS A. KAPLAN, USDJ

9/22/21

LIMITED, CHINA INTERNATIONAL CAPITAL CORPORATION HONG KONG SECURITIES LIMITED, CITIGROUP GLOBAL MARKETS INC., GUOTAI JUNAN SECURITIES (HONG KONG) LIMITED, HSBC SECURITIES (USA) INC., UBS SECURITIES LLC, BOCI ASIA LIMITED, BOCOM INTERNATIONAL SECURITIES LIMITED, CCB INTERNATIONAL CAPITAL LIMITED, CLSA LIMITED, CMB INTERNATIONAL CAPITAL LIMITED, FUTU INC., ICBC INTERNATIONAL SECURITIES LIMITED, MIZUHO SECURITIES USA LLC, and TIGER BROKERS (NZ) LIMITED,

Defendants.

MICHAL KUCHARSKI, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

DIDI GLOBAL INC. f/k/a XIAOJU KUAIZHI INC., WILL WEI CHENG, ALAN YUE ZHUO, JEAN QING LIU, STEPHEN JINGSHI ZHU, ZHIYI CHEN, MARTIN CHI PING LAU, KENTARO MATSUI, ADRIAN PERICA, and DANIEL YONG ZHANG,

Defendants.

Case No. 1:21-cv-06603

**NOTICE OF NON-OPPOSITION OF LEONARD ROSS TO COMPETING
MOTIONS CONSOLIDATION OF RELATED ACTIONS, APPOINTMENT
AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that on September 7, 2021, movant Leonard Ross (“Movant”) filed a motion pursuant to Section 27(a)(3)(B) of the Securities Act of 1933, 15 U.S.C. § 77z-1(a)(3)(B) and Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (“PSLRA”) and Federal Rule Civil Procedure (“Rule”) 42(a) for an Order: (1) consolidating the above-captioned related securities class actions; (2) appointing Movant as Lead Plaintiff; and (3) approving Movant’s selection of Roche Freedman LLP as Lead Counsel for the Class. *See* ECF No. 29. On that date, similar motions were filed by other members of the putative class in this litigation. *See* ECF Nos. 5, 8, 11, 12, 16, 19, 23, 27, and 33.

The PSLRA provides a presumption that the “most adequate plaintiff” to represent the interests of class members is the class member or members that, among other things, has “the largest financial interest in the relief sought by the class” and “otherwise satisfies the requirements of Rule 23.” 15 U.S.C. § 77z-1(a)(3)(B)(iii)(I); 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I).

Having reviewed the competing motions and supporting papers provided by the other class members seeking appointment as lead plaintiff, Movant does not appear to have the largest financial interest as required by the PSLRA. Therefore, Movant provides notice that he does not oppose the competing motions for appointment as lead plaintiff. However, if the Court determines that the other lead plaintiff movants, who appear to have losses larger than Movant, are incapable or inadequate to represent the class in this litigation, Movant remains willing and able to serve as lead plaintiff or as a class representative.

This notice of non-opposition shall have no impact on Movant’s membership in the proposed class, his right to share in any recovery obtained for the benefit of class members, or his

ability to serve as a representative party should the need arise.

DATED: September 18, 2021

Respectfully Submitted,

/s/ Constantine P. Economides

Constantine P. Economides

ROCHE FREEDMAN LLP

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Miami, Florida 33131

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Email: ceconomides@rcfllp.com

Counsel for Movant Leonard Ross

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on September 18, 2021, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record.

/s/ Constantine P. Economides

Constantine P. Economides